

Exhibit E, Excessive Time Analysis Chart

Excessive time spent drafting the Complaint

Date	Timekeeper	Time Spent	Fee
09/15/13	JB	0.5	\$125
09/18/13	JB	1.0	\$250
09/25/13	DRK	2.0	\$800
09/27/13	JB	0.1	\$25
09/30/13	JB	0.5	\$125
10/22/13	JB	1.5	\$375
10/23/13	JB	2.0	\$500
11/19/13	DRK	1.5	\$600
11/20/13	JB	1.0	\$250
11/22/13	JB	1.5	\$375
		11.6	\$3425.00

As it should have only taken 3 hours, at \$250 per hour, to draft the Complaint in this matter, an additional **\$2675** in fees should be cut.

Excessive time spent reviewing the Complaint,
analyzing Defendant's Answer and preparing
for the Rule 26(f) Settlement Conference.

Date	Timekeeper	Time Spent	Fee
01/09/14	JB	0.6	\$150
01/17/14	JB	1.0	\$250
01/21/14	JB	0.5	\$125
01/23/14	JB	1.7	\$425
01/24/14	JB	3.0	\$750
		6.8	\$1700.00

As it should have only taken 2 hours, at \$250 per hour, to prepare for the Settlement Conference in this matter, an additional **\$1200** in fees should be cut.

Excessive time researching prior cases involving Defendant.

Date	Timekeeper	Time Spent	Fee
01/24/14	JB	Unspecified	\$250



		portion of 3 hours	
01/29/14	JB	2.5	\$625
01/30/14	JB	2.5	\$625
02/03/14	JB	1.0	\$250
03/03/14	JB	0.2	\$50
		6.2+	\$1800.00

As it should have only taken 1 hour, at \$250 per hour, to research prior cases involving Defendant, an additional **\$1550** in fees should be cut.

Excessive time researching FWW method.

Date	Timekeeper	Time Spent	Fee
09/05/13	JB	3.0	\$750
09/06/13	JB	4.0	\$1000
09/09/13	JB	2.0	\$500
09/11/13	JB	1.0	\$250
09/23/13	JB	0.8	\$200
01/25/15	JB	0.3	\$75
03/07/14	JB	3.7	\$925
03/13/15	JB	4.0	\$1000
03/14/15	JB	1.5	\$375
		20.3	\$5075.00

As it should have only taken 6 hours, at \$250 per hour, to research the FWW method, an additional **\$3575** in fees should be cut.

Excessive time preparing Motion for Conditional Certification.

Date	Timekeeper	Time Spent	Fee
01/24/14	JB	0.5	\$125
02/06/14	JB	2.6	\$650
02/07/14	JB	3.5	\$875
02/08/14	DRK	2.5	\$1000
02/10/14	JB	1.0	\$250
02/14/14	JB	3.0	\$750
02/17/14	JB	0.3	\$75
02/18/14	JB	0.7	\$175
02/18/14	DRK	4.8	\$1920

02/24/14	JB	1.3	\$325
		20.2	\$6145.00

As it should have only taken 10 hours, at \$250 per hour, to prepare a Motion for Conditional Certification, an additional **\$3645** in fees should be cut.

Excessive time preparing Reply Brief for Conditional Certification.

Date	Timekeeper	Time Spent	Fee
03/14/14	JB	3.5	\$875
3/17/14	JB	1.3	\$325
03/18/14	JB	2.0	\$500
03/18/14	DRK	3.8	\$950
03/21/14	JB	2.0	\$500
03/22/14	JB	1.5	\$375
03/24/14	JB	2.3	\$575
03/25/14	JB	0.5	\$125
03/27/14	JB	1.0	\$250
		17.9	\$4475.00

As it should have only taken 8 hours, at \$250 per hour, to prepare a Reply in support of a Motion for Conditional Certification, an additional **\$2475** in fees should be cut.

Excessive time preparing Motion to Amend / Add Party Plaintiff.

Date	Timekeeper	Time Spent	Fee
03/11/14	JB	1.1	\$275
03/12/14	JB	1.0	\$250
03/14/14	JB	0.5	\$125
03/17/14	JB	1.3	\$325
04/14/14	JB	1.7	\$425
04/15/14	JB	0.7	\$175
		6.3	\$1575.00

As it should have only taken 2 hours, at \$250 per hour, to prepare a Motion to Amend / Add a Party Plaintiff, an additional **\$575** in fees should be cut.

Excessive time preparing Reply in support of
Motion to Amend / Add Party Plaintiff.

Date	Timekeeper	Time Spent	Fee
04/02/14	JB	5.1	\$1275
04/03/14	JB	2.5	\$625
04/08/14	DRK	2.0	\$800
04/14/14	JB	1.7	\$425
04/15/14	JB	0.7	\$175
		12.0	\$3300.00

As it should have only taken 4 hours, at \$250 per hour, to prepare a Reply in support of a Motion to Amend / Add a Party Plaintiff, an additional **\$2300** in fees should be cut.

Excessive time performing miscellaneous tasks.

Date	Timekeeper	Time Spent	Fee	Task
02/04/14	JB	3.0	\$750	Researching "Steve Jones cases"
02/05/14	JB	3.0	\$750	Researching social media discoverability
02/08/14	DRK	1.0	\$400	Phone call with "upset" client
02/02/15	DRK	2.4	\$960	Speaking with expert
		12.0	\$2860.00	

As it should have only taken 3.3 hours, at \$250 per hour, to perform these tasks, an additional **\$2035** in fees should be cut.

Excessive time researching and arguing Rule 8.

Date	Timekeeper	Time Spent	Fee
07/27/15	TC	0.5	\$100
07/28/15	TC	2.0	\$400
07/29/15	TC	5.7	\$1140
07/30/15	TC	5.0	\$1000

08/30/15	TC	6.0	\$1200
10/23/15	TC	2.6	\$520
		21.8	\$4360.00

As it should have only taken 5 hours, at \$200 per hour, to perform these tasks, an additional **\$3360** in fees should be cut.

See, e.g., Vazquez v. 1052 LLC, 2016 U.S. Dist. LEXIS 17055, 7-8 (S.D. Fla. Feb. 11, 2016) (3.5 hours charged for drafting FLSA complaint reduced to 2 hours); *Kelley v. TaxPrep1, Inc.*, 2015 U.S. Dist. LEXIS 163708, 15-16 (M.D. Fla. Nov. 20, 2015) (reducing block-billed time for drafting complaint); *Oliva v. Infinite Energy, Inc.*, 2013 U.S. Dist. LEXIS 180117, at *31-32 (N.D. Fla. Dec. 24, 2013) (“Although counsel was required to review the file to prepare for the settlement conference five hours was more than excessive. Accordingly, 4.0 hours will be deducted from the time requested for this work.” . . . “In view of the fact Plaintiff’s attorney already spent two hours researching this issue in April, two hours additional hours on the same issue is excessive and unnecessary.”); *Nipper v. Lakeland Hotel Investors, Ltd.*, 2010 U.S. Dist. LEXIS 130909, 7-8 (M.D. Fla. Nov. 30, 2010) (cutting 16 hours of research on application of 3 year statute of limitations to willful FLSA claims and application of FWW, among other issues); *Masino v. Rib City Immokalee*, 2009 U.S. Dist. LEXIS 25108 (M.D. Fla. Feb. 26, 2009) (rejecting claim for 4 hours when the complaint was “a simple FLSA complaint that should take no more than one (1) hour to draft”).

Excessive time preparing similar complaints.

Date	Timekeeper	Time Spent	Fee	Task
06/17/15	JB	3.5	\$875	Draft 2nd Complaint
06/23/15	JB	0.5	\$125	Revise & Edit 2nd
06/24/15	JB	0.9	\$225	Revise & Edit 2nd
07/09/15	JB	0.2	\$50	Finalize 2nd
10/19/15	JB	2.5	\$625	Draft individual complaints
10/21/15	JB	1.1	\$275	Continue drafting
10/23/15	DRK	4.5	\$1125	Edit and review
10/26/15	JB	0.2	\$50	Revise individual form
10/27/15	JB	2.8	\$700	Preparing chart for complaints
10/28/15	JB	2.8	\$700	Preparing chart for complaints
10/29/15	JB	2.1	\$525	Preparing chart for complaints
10/30/15	JB	6.7	\$1675	Preparing chart for complaints
10/31/15	JB	1.6	\$400	Continue drafting
11/02/13	JB	5.8	\$1450	Continue preparing
		35.2	\$8800.00	

As it should have only taken 10 minutes, at most, to draft each of the 48 complaints that followed Plaintiffs' original claim herein, they should only be able to bill a total of 16 hours for drafting those items, all at \$250 per hour. Thus, an additional **\$6800** in fees should be cut. *See Isaula v. Chi. Rest. Group, LLC*, 2014 U.S. Dist. LEXIS 98256 (S.D. Fla. July 11, 2014) (reducing complaint drafting time to .1 hour: "The following entries were plainly copied-and-pasted, in whole or in part, from another similar action.").

Redundant time performing duplicative tasks.

Date	Timekeeper	Task	Time Spent	Fee
03/03/14	DRK & JB	Meeting with each other	0.5 each	\$325
04/22/14	DRK & JB	Preparing for deposition	2.5 each	\$1625
04/23/14	DRK & JB	Taking deposition	4.8 each	\$2470

12/01/14	DRK & JB	Meeting with clients	0.7 each	\$455
12/02/14	DRK & JB	Meeting with each other	0.3 each	\$195
01/12/15	DRK & JB	Meeting with clients	9.1 each	\$5915
01/13/15	DRK & JB	Meeting with clients	0.8 each	\$520
01/16/15	DRK & JB	Talking with clients	0.8 each	\$520
01/20/15	DRK & JB	Call opposing counsel	0.7 each	\$455
01/20/15	JB	Various, billed twice	1.6 twice	\$800
01/22/15	DRK & JB	Talking with clients	Blockbilled (0.5 each?)	\$325
08/19/15	JB	Research, billed twice	0.2 twice	\$100
			22.5	\$13705.00

As these tasks were either double-billed by one attorney or performed by two attorneys redundantly, fees for only half of those hours should be recovered, again at the rate of \$250 per hour. An additional **\$8080** should be cut.

- Time spent on unnecessary research about the ADA
- and decertification appeal that was never pursued.

Date	Timekeeper	Time Spent	Fee
01/13/15	TO	1.3	\$149.50
01/15/15	TO	2.0	\$230.00
01/19/15	TO	0.5	\$57.50
06/26/15	JB	1.4	\$350
06/26/15	JB	0.4	\$100
06/28/15	JC	0.9	\$225
06/29/15	JC	4.1	\$1025
06/30/15	JB	1.5	\$375
07/01/15	JC	0.1	\$25
07/06/15	JB	1.5	\$375
07/08/15	JB	0.3	\$75
			\$2987.00

Because Plaintiffs never asserted an ADA claim or filed an interlocutory appeal on the decertification issue, these **\$2987** in unnecessary fees should be cut.